

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
KEVIN D. SCHIFF
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
Kevin.Schiff@usdoj.gov
Attorneys of the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA MARTINEZ,

Defendant.

2:18-cr-00294-APG-DJA

**Stipulation to Extend Government's
Response to Defendant's Motion to
Suppress [ECF No. 96] (Second Request)**

It is stipulated and agreed, by and between Nicholas A. Trutanich, United States Attorney; Kevin D. Schiff, Assistant United States Attorney, counsel for the United States of America, and Randall J. Roske, Esq., counsel for Defendant Joshua Martinez;

That the Government shall have an extension of no less than 120 days to respond to Defendant's Motion to Suppress filed August 15, 2019. ECF No. 96. The parties are attempting to negotiate a non-trial resolution in this matter. Should that negotiation be successful it will obviate the need to litigate the Motion to Suppress.

Further, the defense is now in the process of having Martinez's competency to

1 proceed evaluated. Such evaluation is not scheduled until April 2020, which scheduling may
2 be further complicated by current national events.

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4 DATED this 20th day of March, 2020.

5 NICHOLAS A. TRUTANICH
6 United States Attorney

7 /s/ Kevin Schiff
8 Kevin D. Schiff
9 Assistant United States Attorney

10 /s/ Randall J. Roske
11 Randall J. Roske, Esq.
12 Counsel for Defendant
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1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

2:18-cr-00294-APG-DJA

4 Plaintiff,

Order Per Stipulation of the Parties

5 vs.

6 JOSHUA MARTINEZ,

7 Defendant.

8 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
9 Government shall have until July 24, 2020, in which to respond to
10 Defendant's Motion to Suppress, ECF No. 96.

11 IT IS SO ORDERED:

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13 _____
14 THE HONORABLE DANIEL J. ALBREGTS
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: March 26, 2020
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